

US EPA ARCHIVE DOCUMENT



SALT RIVER PIMA-MARICOPA INDIAN COMMUNITY

Environmental Protection & Natural Resources

10005 EAST OSBORN ROAD, SCOTTSDALE, AZ 85256 (480) 362-7500 EPNR@srpmic-nsn.gov



March 9, 2009

Laura Yoshii, Acting Regional Administrator
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

Dear Ms. Yoshii:

Thank you for the information letter regarding Environmental Protection Agency (EPA)'s process for designating areas for the 2008 revised ozone national ambient air quality standards (NAAQS).

The Salt River Pima-Maricopa Indian Community (SRPMIC or Community) is a federally recognized tribal community located in the urban metropolitan region of Maricopa County, Arizona. As a tribal community located in the a major metropolitan area, the impacts of transported ozone are of significant concern to SRPMIC, primarily because of the Community's location relative to the City of Phoenix and other regional municipalities, and the prevailing conveyance of ozone onto the Community.

Currently, the Community's air quality data indicates two (2) of its four (4) air quality monitors are currently violating the new ozone standard and are attributable to the transport of ozone from the surrounding Phoenix metropolitan cities. As, the Community's principal industrial sources of emission located within the exterior boundaries of the Community include Salt River Materials Group (SRMG) mining operations, several asphalt and concrete batch patches, and the Salt River Landfill, and individually, nor collectively reach or go beyond the NAAQS. The landfill gas collection system operating at the active Salt River Landfill and closed Tri-Cities Landfill according to the Community's air quality data also meets the NAAQS. The data shows that automobiles are likely the primary source of ozone precursor emissions, with the Community residents contributing an extremely small portion of the vehicle miles traveled (VMT) within the Community.

The Community has approximately 84.35 square miles and 8,500 members. In contrast, Maricopa County has approximately 9,222 square miles and a population of 3,768,123. While the Community has made remarkable progress in creating an infrastructure to attract and service business growth opportunities, it remains predominately a rural area with 19,000 acres of preserve. As these numbers indicate, the Phoenix area is experiencing rapid growth, while the Community shows a significant difference in residential and commercial development when compared to the rapidly growing surrounding area.

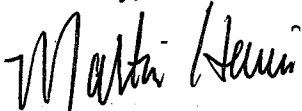
During the summer, winds typically blow across the Phoenix valley from the west toward the east and northeast. Ozone essentially migrates in a regular pattern across the Phoenix valley, with ozone precursors generated in the center of the greater Phoenix area and moving to the east and northeast as the

precursors react in the presence of sunlight. As a result, the Community becomes essentially a victim of ozone transport from the greater Phoenix airshed. There are no geographic or topographic boundaries that prevent ozone precursor emissions from the Phoenix area from entering the Community's airshed.

While the Community recognizes the importance of monitoring data that illustrate ozone exceedances, it is the recommendation of the Community that it be designated 'attainment/unclassifiable' until such time that provisions for equitable treatment and future economic development can be achieved so as not to impede potential economic development opportunities on the Community as a result of off-reservation pollution generation and transport. In addition, the Community will require additional federal funding to continue to mitigate the serious ozone issues that impact the Community and its residents as a result of ozone transport.

As a tribal sovereign, the Community appreciates the opportunity to submit these comments regarding the 2008 ozone designation and looks forward to working in partnership with the U. S. Environmental Protection Agency to address the designation of the Community and regional ozone concerns. Should you or your staff have any questions or concerns, please do not hesitate to contact me at your convenience at 480-362-7625 or via email at ondrea.barber@srpmic-nsn.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Harvier". The signature is fluid and cursive, with the first name "Martin" being more prominent than the last name "Harvier".

Martin Harvier
Vice President

Salt River Pima Maricopa Indian Community

cc: Ondrea Barber, Manager, Environmental Protection & Natural Resources
Stacey Gubser, Community Development Department Director